

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KEMPER VALVE & FITTINGS CORP.

Plaintiff,

V.

BUDDY WOOD, KENNETH KLINGBAIL,
FLOW VALVE, LLC,

Defendants.

No. 08 C 513

Honorable Judge Guzman
Magistrate Judge Nolan

**MOTION OF DEFENDANTS BUDDY WOOD AND
KENNETH KLINGBAIL TO TRANSFER VENUE**

Defendants, Buddy Wood and Kenneth Klingbail, by their attorneys and pursuant to 28 U.S.C. § 1404(a), move to transfer venue of this case to the United States District Court for the Eastern District of Oklahoma as a more convenient forum that would have jurisdiction over all parties. In support of this Motion, Defendants Wood and Klingbail state as follows:

1. Defendants Wood and Klingbail reside and work in the State of Oklahoma.

Defendant Flow Valve, LLC is an Oklahoma limited liability company with its operations located only in Oklahoma. In this case the balance of the public and private interest factors clearly indicate that a transfer of venue to the United States District Court for the Eastern District of Oklahoma will better serve the convenience of the parties and witnesses and the interests of justice, and will constitute a forum that would have jurisdiction over all Defendants to resolve all issues raised by Plaintiff.

2. In support of their Motion, Defendants Wood and Klingbail separately submit their Memorandum in Support and attach to this Motion the Declarations of:

- Mark Nowell (Exhibit A);

- Buddy Wood (Exhibit B); and
- Kenneth Klingbail (Exhibit C).

WHEREFORE, Defendants Buddy Wood and Kenneth Klingbail respectfully request the Court to transfer venue of this case to the United States District for the Eastern District of Oklahoma.

Dated: February 29, 2008

Respectfully submitted,

/s/ Paul E. Lehner

One of the attorneys for defendants,
Buddy Wood and Kenneth Klingbail

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CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Defendants Buddy Wood and Kenneth Klingbail, certifies that, on February 29, 2008, he caused a copy of the Motion of Defendants Buddy Wood and Kenneth Klingbail to Transfer Venue to be served by means of ECF to:

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/s/ Paul E. Lehner